



THE CITY OF NEW YORK  
LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, NY 10007

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August 30, 2010

C/H

**BY ECF**

Honorable Brian M. Cogan  
United States Judge  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, NY 11201

Extra pages are denied. Defendants are directed to include a final brief point stating in one sentence each (at most) the grounds for dismissal of those claims for relief that they deem most marginal. If the Court is not inclined to dismiss those claims, it will grant defendants leave to file a supplemental brief before ruling on the motion.

SO ORDERED.

8/31/10

Re: Gounden v. City, et al., Index No. 10 CV 3438

/Signed by Judge Brian M. Cogan/

U.S.D.J.

Dear Judge Cogan:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel for the City of New York, and at this time, this office is representing the City of New York, Joseph Addabbo, and Helen Marshall.

I am writing to request permission to exceed the twenty-five page limit placed on memorandums of law submitted in support of a motion. Per the Court's order, City defendants will be submitting on September 8, 2010 a motion to dismiss. Because the complaint asserts twenty-six causes of action against several defendants on multiple statutory and common law grounds, it will be necessary to exceed the twenty-five page limit in order to respond to all the issues raised in the complaint. Currently, City defendants' memorandum of law is 23 pages, and there remains several state claim related issues to address. Therefore, I respectfully request a ten-page extension to address these remaining issues.

Thank you for your consideration.

Sincerely yours,  
/s/  
William Vidal  
wvidal@nyc.law.gov  
(212) 788-8683

CC: Kris Gounden (by e-mail and mail)